

U.S. EPA REMOVAL ACTION
AT THE
FORMER STATLER HILTON HOTEL
DETROIT, WAYNE COUNTY, MICHIGAN
EMERGENCY CONTINGENCY PLAN
06 SEPTEMBER 2003



The Former Statler Hilton Hotel (FSHH) site is located at 1539-1565 Washington Blvd. in Detroit, Wayne County, Michigan (Figure 1). The geographical coordinates for the site are 42°20'7.764" north latitude and 83°03'5.681" west longitude. The site is located in downtown Detroit, Michigan, in a mixed industrial/retail area. The site is located directly south of Grand Circus Park, and southwest of Comerica Park. The area is mostly vacant.

The site was a former hotel constructed in the early 1900's by hotel developer E.M. Statler. The hotel closed in 1975 and was turned over to the City of Detroit in 1979 for foreclosure after the owner (Detroit Hilton Limited Partnership) could not pay its back taxes. In 2000, MDEQ commenced asbestos abatement and debris removal from the site. Near completion of this cleanup phase, MDEQ discovered the presence of several transformers carcasses in the basement and the fourth floor in the site. MDEQ conducted PCB sampling of the areas around the transformer carcasses. MDEQ reviewed the PCB analytical data and then requested the assistance of the U.S. EPA to initiate and finish the site PCB cleanup activities.

In October 2002, EPA and its contractors conducted a site walk through and identified the transformer carcasses. Multimedia sampling was conducted. Solid samples were collected from the floor around the base of the transformers. A water sample was collected from the sub-basement and wipe samples were collected from the transformers. Analytical results show elevated PCB levels in all media.

On September 02, 2003, U.S. EPA initiated a removal action at the FSHH site to remove all the PCB transformers located on site. U.S. EPA command post will be established inside the building. Primary activities include removal of the transformers, removal of debris in basement area, cleaning and scrapping of basement floor, scarifying spill areas, wipe and concrete core sampling, and off-site disposal of wastes considered hazardous. Decontamination of process equipment will be performed as necessary. The following protocols provide necessary guidance for the following potential response events:

Vandalism/ Theft/ Trespass
Medical Emergencies
Fire/ Explosion

Vandalism/ Theft/ Trespass

Vandalism/ trespass is a threat during working and non-working hours. When the crew is not on-site, an armed guard is providing security. A fenced area adjacent to Bagley Street and a wood structure built across the front entrance off Washington Ave. provide daytime site security. In the event of vandalism/ theft of U.S EPA or contractor's property or interference by trespassers with daily work activities, the Detroit Police Department 1st Precinct will respond and coordinate with U.S. EPA On-Scene Coordinator Jeff Kimble.

Medical Emergencies

Rescue operations, if necessary in the exclusion zone, are to be conducted only if it is not possible for the injured person to be brought outside to EMS personnel. The exclusion zone is primarily limited to the basement and 4th floor of the building where spilled PCBs are located. If possible, response to medical emergencies will include decontaminating and removing injured personnel from the exclusion zone to the support zone. If possible, ERRS crew will decontaminate the victim prior to the arrival of ambulance service on-site, and the victim will be attended to at the support zone.

The victim should be decontaminated to the maximum extent possible, paying particular attention to the areas of the body or clothing that were in contact with site contaminants. If the injury is minor, a full decontamination should be completed and first aid administered prior to transport. If the victim's condition is serious, at a minimum, emergency decontamination should be completed using the eye wash station located in the support zone. For emergencies requiring transport to a hospital, gross decontamination will be handled by site crew. If further treatment is required, medical treatment and transport can be handled by EMS personnel.

Fire/ Explosion

In the event of a fire during working hours, the On-Scene Coordinator and Response Manager will be immediately notified, verbally or via radio, and, if the fire is small, will be extinguished using on-site fire extinguishers.

If a large fire occurs during working hours, personnel will immediately exit the exclusion zone through the nearest exit and meet at the designated area for a "head" count (Grand Circus Park). No one is to enter the exclusion zone for fire fighting purposes without personal protective equipment that meets, at a minimum, NFPA level "D" requirements. NFPA level "D" protection consists of a minimum of an SCBA and firefighter turnout gear. The Detroit Fire Department will be contacted to respond to all fires/ explosions at the site and will work in coordination with the U.S. EPA On-Scene

Coordinator for the specific locations of hazardous materials. The fire department will evacuate residents as necessary. Telephone numbers of personnel who should be contacted in the event of an incident are listed in the attached page.

At a minimum, the following personnel should be notified:

- U.S. EPA On-Scene Coordinator, Jeff Kimble
- Local Fire Department via 911
- Environmental Quality Management Response Manager, Bob Armstrong

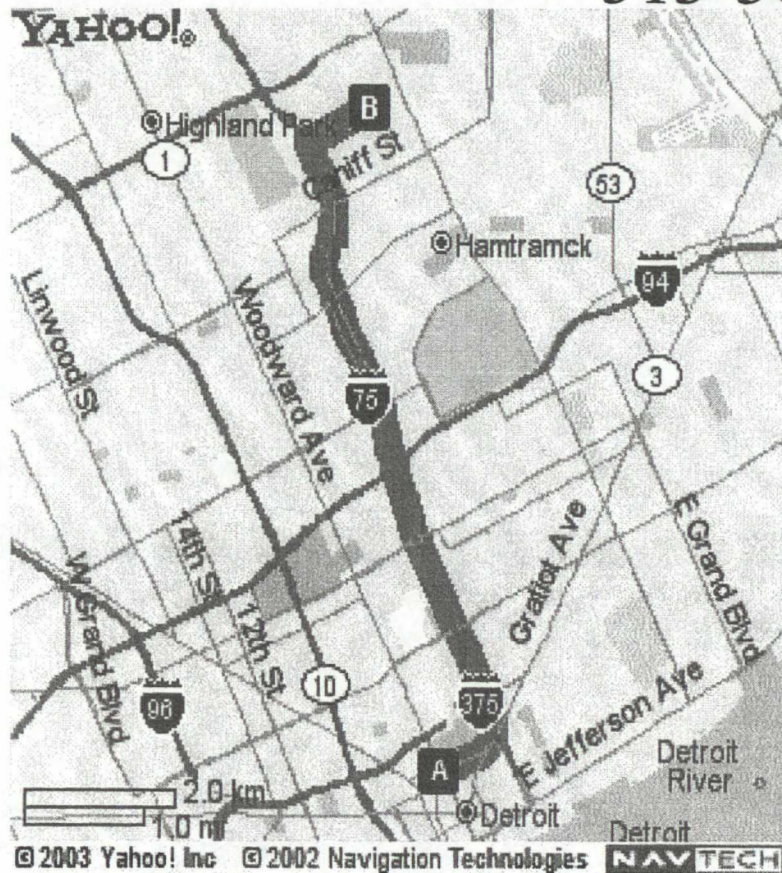
In the event of heavy smoke or toxic gas emission, an evacuation may be necessary and should proceed according to LEPC-EMA guidelines. U.S. EPA Superfund Technical Assessment and Response Team (START) will assist with air monitoring. START assistance will be coordinated through EPA.

**FORMER STATLER HILTON HOTEL SITE
DETROIT, WAYNE COUNTY, MICHIGAN**

LIST OF CONTACTS

Federal	Contact	Phone Number
U.S. EPA On-Scene Coordinator, Grosse Ile, Michigan	Jeff Kimble	(734) 692-7688 (office) (734) 740-9013 (cell) (734) 692-7677 (fax) (888) 719-1521 (pager)
National Response Center	Duty Officer	(800) 424-8802
U.S. EPA Contractors	Contact	Phone Number
Weston (START) Contractor	Lori Ash	(313) 989-2527 (office) (586) 524-0613 (cell)
Environmental Quality Management (ERRS) Contractor	Bob Armstrong	(440) 812-1806 (cell)
Local/State	Contact	Phone Number
Detroit Police Department 1 st Precinct		(313) 596-5101 or 911
Local Fire Department	Duty Chief	911
Greater Detroit Hospital	N/A	(313) 369-3000

Greater Detroit Hospital
3105 Carpenter Ave
Detroit MI
313-369-3000



- Start on **PARK AVE** (at **WASHINGTON BLVD & PARK AVE** in **DETROIT**) going towards **WASHINGTON BLVD** - go **< 0.1 mi**
- 2. Continue on **WITHERELL ST** - go **0.1 mi**
- 3. Turn on **MADISON ST** - go **0.4 mi**
- 4. Take **I-75 NORTH** towards **NORTH FISHER FWY** - go **3.3 mi**
- 5. Take the **CANIFF AVE/HOLBROOK AVE** exit, exit **#55** - go **0.2 mi**
- 6. Continue on **CHRYSLER DR** - go **0.6 mi**
- 7. Continue on **NAGEL ST** - go **0.7 mi**
- 8. Turn on **CARPENTER ST** - go **0.6 mi**
- 9. Arrive at **3105 CARPENTER ST, DETROIT**

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DETROIT SHINES IMAGE FOR THE SUPER BOWL: City prepares to make a statement to world

August 4, 2003

BY JOHN GALLAGHER
FREE PRESS BUSINESS WRITER

Detroit is putting on its game face.

Super Bowl XL will be played at Ford Field on Feb. 5, 2006, and civic leaders have no intention of letting 3,000 media representatives and a worldwide audience of 800 million people see the kind of downtown blight that Detroiters have lived with for decades.

With a scant 2 1/2 years left before kickoff, public and private leaders are mounting a massive assault on downtown deterioration and, with it, on the city's image of Rust Belt decay.

In its place, they want to re-create Detroit's lost identity as a muscular and upbeat city that can tackle any task -- and entertain itself in the process.

"We're going to garner the attention of the entire globe in one aspect or another. The last thing we want is for media to write negative stories about vacant buildings," said Larry Alexander, president and chief executive of the Detroit Metro Convention and Visitors Bureau.

To erase this potentially embarrassing downtown blight, the city is rolling up its sleeves for a multimillion-dollar effort to be formally announced this fall. The city plans to reshape streets, clean up old buildings, lure new retailers and residents, and once and for all renovate or raze so-called dinosaur buildings like the vacant Statler Hotel on Grand Circus Park.

If successful, it's a program that will benefit Detroiters long after the Super Bowl is over. Yet the Super Bowl itself creates a unique opportunity -- and deadline -- to get the work done.

It's hard to overestimate the media impact of hosting a Super Bowl. From the shots of the skyline from the blimp to the season-long buildup with players saying they're playing to get to the host city, everything works to keep the Super Bowl city in the spotlight.

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"This is definitely a time to make a statement," said Greg Ortale, president and chief executive of the Greater Minneapolis Convention & Visitors Association, who helped shape the Minnesota city's plans for the 1992 Super Bowl.

Details of this media onslaught are captured in the National Football League demands on a host city. Among the media space needed, NFL planners are requiring Detroit to provide space to park as many as 50 television satellite uplink trucks for the game; to provide 700 free parking spaces for the media; and to provide 400,000 square feet of working space -- the equivalent of a 20-story skyscraper -- for local, national and international TV teams.

Nor are media types the only ones the city wants to impress. Uncounted numbers of corporate VIPs will turn up for Super Bowl parties and events. In just one telling indicator on the mogul meter, the NFL told the city to arrange for a helipad that can handle as many as 400 helicopter landings and takeoffs on the game day itself.

All those influential eyes on Detroit could create a whole new positive buzz about the city everywhere that opinion is shaped. But they also could reinforce a negative image fashioned from Angel's Night fires and footage of abandoned factories.

"This is a defining moment for us in Detroit," said Susan Sherer, executive director of the city's Super Bowl XL Host Committee. "If the roads are in disrepair and buildings look dilapidated, if logistics and traffic and trash are not right, they will pick on us. Detroit is going to end up being the story."

'Way beyond awnings'

Of course, it's part of local lore how the City of Detroit put awnings on the vacant Statler Hotel before the Republican National Convention in 1980 to hide the blight. It didn't work. It became a joke.

This time around, if successful, the cleanup program will touch virtually every building and street downtown, and scrub decades of decay from the face of the city.

"Awnings are part of it, but we're going way behind awnings," said Greg Garland, executive vice president of the Detroit Economic Growth Corp., which is overseeing much of the work.

But if the "why" and "what" are clear, the question of "Will Detroit be ready?" is harder to answer. Mayor Kwame Kilpatrick and his aides plan to announce the effort, known informally as the Lower Woodward Plan, this fall. But it's already obvious that the program, if fully implemented, will cost tens of millions of dollars in public and private funds.

It also will require a so-far unseen level of cooperation and effort from corporations, foundations, developers, and city officials.

Then, too, the cleanup effort will need the active assent of property owners. Many of them have been reluctant to spruce up their buildings before now because of low property values.

Moreover, even with the game still 2 1/2 years away, time is running short. Leaders are acutely aware that only two full construction seasons remain after

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this year to complete dozens of projects.

"It's a very aggressive wish list, and it's important that we get the majority of them done," Garland said. "Some of them will probably carry on beyond the Super Bowl itself, but it's very important that we put our best foot forward."

Despite the daunting task, leaders are upbeat about Detroit's chances.

"We shouldn't expect that every single thing that should have been done over the past 25 years is going to be done by then, because there's not enough time to make that happen," Alexander said. "But the momentum will be under way."

Said Sherer: "I'm realistic in knowing that people aren't going to walk up and down Woodward Avenue and see Banana Republic and Gap and Nordstrom. That's not going to happen in this window of time. But will they see some clean streets and good signage and park benches and landscaping and lighting and a few new businesses and attractions and restaurants and some lofts opened up? Yes, I think they're going to see that. Isn't it great?"

Scope of work

Garland said that the city is planning to formally announce the start of the entire Lower Woodward program once the initial planning, including the preparation of architectural renderings, is completed. "These programs don't work if people don't know about them," he said.

The massive cleanup effort pulls together so many projects that some predate the NFL's awarding of Super Bowl XL to Detroit. Some are already under way, like the recently announced renovation of the Book-Cadillac Hotel, now in the early stages of a \$150-million remake. If the construction schedule holds, the hotel will reopen as the Renaissance Book-Cadillac in late 2005 with about 485 rooms and 80 rental apartments.

But the scope of work for the Lower Woodward Program goes far beyond that. Among its major elements:

Streetscape improvements: Three major downtown streets -- Washington Boulevard, Woodward and Broadway -- will see major improvements. Costs are uncertain until architectural and engineering plans are completed, but Garland estimated the three projects could run between \$16 million and \$19 million total.

Gateways: In a series of projects known as the "gateways," three other streets will receive some lesser but still important makeovers with landscaping, lighting and so forth. The three streets, all major entries to downtown, are Gratiot from Eastern Market to Broadway; Michigan from the Lodge to Campus Martius, and Grand River from I-75 to Woodward.

Dinosaur buildings: The city has developed a list of several buildings that it considers dinosaurs -- prominent derelicts that must be renovated or razed before the Super Bowl. Costs are uncertain, but each one could cost several million dollars to tear down -- or a similar amount would be needed as the city's portion of any redevelopment plan.

Owner match program: The city had identified nearly 90 other downtown buildings and 17 surface parking lots that need to be cleaned or otherwise

spruced up for the Super Bowl. The city is developing a 50/50 matching program worth up to \$12 million in total to work with owners to accomplish the cleanup.

New housing: The city wants to create 2,000 residential housing units in the immediate downtown area by the Super Bowl, mostly by renovation of existing buildings into lofts.

New storefronts: The city has set a goal of luring 50 new shops, restaurants, galleries and other street-level businesses by the Super Bowl. The idea is to create a livelier street life in Detroit's often bleak downtown.

Problems ahead

Of course, if blight were easy to eradicate, it would be gone by now. Certainly there are obstacles in the way of achieving the city's goal of a livelier, more attractive downtown. Among them:

- A lawsuit filed by the Lac Vieux Desert tribe of Indians continues to delay construction of three permanent casino complexes. Super Bowl planners hope the suit will be resolved in time for construction to begin on the three 400-room hotels that will be part of those projects. Permanent casinos also would bolster the city's reputation as an entertainment destination with a lot to offer visitors.

Work on the casinos probably needs to start sometime early next year to ensure completion by the Super Bowl.

- Much of the plan depends on the goodwill and cooperation of downtown property owners, many of whom have been unwilling to fix their buildings before now because of low property values. Even with a matching grant from the city, property owners still would have to pony up money for the facade improvements.

- Some of the money for the overall program has been earmarked from downtown tax and bonding funds that exist. But a lot more still needs to be raised.

Elliott Hall, a prominent attorney with the Dykema Gossett law firm, has been hired by the city to raise \$60 million from foundations, corporations and other sources to pay for some of the gateway improvements and demolition of dinosaur buildings. That fund-raising effort is just getting under way. Hall said he hopes to have the money raised by the middle of next year.

"That is ambitious, but I believe it can be done, and we're going to go after it," he said.

Moreover, plans are in the works to ask downtown property owners to agree to fund the creation of a business-improvement district to spend up to \$3.6 million a year to help pay for part of the cleanup work and streetscape improvements, as well as hiring uniformed ambassadors to serve as greeters and enhance public safety.

Intangibles a key, too

Cleaner buildings and streets are only part of the task to get the city ready for

Super Bowl XL. There will be traffic and security to coordinate, and thousands of volunteers to recruit and train. Probably, something needs to be done to enhance Detroit's culture of hospitality so that snarly cabbies or inattentive hotel clerks don't give the city a bad name.

Not much can be done about Detroit's weather in February. But local officials say snow and ice don't worry them much, anyway. Minneapolis, after all, had a good Super Bowl experience in an even colder clime.

"I don't think weather is nearly as much of a threat as these vacant buildings," said one civic leader who asked not to be named because of the sensitivity of the subject. "At the end of the day, if you look up and all you see is vacant, we're in trouble."

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